

### Remarks

In the current final Office Action, the Examiner maintained the rejection of pending claims 1-42 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,849,465 (Uchida). Applicants' representative conducted an interview with the Examiner on January 12, 2006 and agreement was reached regarding the interpretation of Uchida relative to the pending claims. Accordingly, the Examiner agreed to withdraw the finality of the last Office Action and will either issue a new, non-final Office Action or allow the pending claims. Following is a reiteration of Applicants' position regarding Uchida in response to the rejections in the final Office Action and Applicants' summary of the substance of the interview held on January 12, 2006.

### Response to Rejections

In the current final Office Action the Examiner has maintained the rejection of claims 1-42 as being anticipated by U.S. Patent No. 5,849,465 ("Uchida") under 35 U.S.C. § 102(b). In light of Applicants' previous comments in response to the first Office Action and the interview held with the Examiner on January 12, 2006, Applicants respectfully maintain their traversal of these rejections.

Uchida teaches a photosensitive liquid precursor solution that polymerizes when exposed to ultraviolet radiation (see Uchida, col. 3, lines 16-18). In use, Uchida teaches that this precursor solution may be applied to an integrated circuit substrate as a film and exposed to ultraviolet radiation under a mask (see Uchida, col. 3, lines 34-35). The *exposed* portions will polymerize and *remain on* the substrate during development, and the *unexposed* portions, which are unpolymerized, are *washed away* when the film is developed (see Uchida, col. 3, lines 43-45; col. 11, lines 51-57).

To the contrary, the embodiments of the present invention claimed in independent claims 1 and 28 recite that a predetermined portion of the precursor layer is exposed and developed thereby substantially removing this predetermined portion. In other words, it is the exposed portion that is removed, whereas Uchida teaches that the exposed portion remains on the substrate. Therefore, Uchida teaches the opposite of the embodiments recited in claims 1 and 28 and does not teach or suggest the embodiments as recited in independent claims 1 and 28 or as recited in any of the corresponding dependent claims 2-27 and 29-39.

Regarding independent claims 40-42, Uchida does not teach or suggest titanium (IV) diisopropoxide bis(ethyl acetoactate) as recited in these claims. Uchida does not teach or suggest a precursor comprising this compound in combination with a casting solvent as recited in independent claim 40. Uchida does not teach or suggest a film of material

comprising this compound as recited in independent claim 41. Uchida does not teach or suggest an electronic component comprising a substrate and this compound on the substrate as recited in independent claim 42.

The Examiner cites to column 14, line 34 where diisopropoxide is disclosed in response to Applicants' prior argument that Uchida does not teach or suggest the compound recited in claims 40-42. However, this citation is for one of the reaction components used in making one of the liquid precursor solutions taught by Uchida. In other words, the titanium (diisopropoxide)bis(acetylacetonate) cited by Uchida is a reactant used with acid to generate the desired liquid precursor solution of barium strontium titanate metal oxide. Neither this liquid precursor solution nor the titanium (diisopropoxide)bis(acetylacetonate) used in making this liquid precursor solution can be construed as teaching titanium (IV) diisopropoxide bis(ethyl acetoactate) recited in claims 40-42. Therefore, Uchida does not teach or suggest the compound as recited in claims 40-42.

#### Substance of the Interview

Applicants appreciate the Examiner's time given during the interview of January 12, 2006. In that interview, the Examiner and Applicants' representative, the undersigned, discussed U.S. Patent No. 5,849,465 ("Uchida"). In particular, Applicants' representative pointed to Figure 13 and the corresponding text at column 11, lines 51-54, wherein the photomask 362 is described as having a light transmission area 364 and a light blocking area 366. Applicants' representative pointed out that the portion of the precursor film 360 that is developed and removed is that portion under the light blocking area 366. Applicants' representative noted that the portion 370 of the precursor film 360 that remained after development was that portion 370 under the light transmission area 364 of the photomask 362. Applicants' representative noted that the claims in the current application are directed, in part, to exposing a predetermined portion of the precursor layer and developing the predetermined portion thereby substantially removing the predetermined portion, which is essentially the opposite of what Uchida teaches.

Based on this discussion, it was agreed that Applicants would reply to the final Office Action and, in response, the Examiner would either issue a new, non-final Office Action or allow the claims and the application.

#### Conclusion

Based on the foregoing, Applicants request the withdrawal of the finality of the current Office Action. In addition, Applicants respectfully request withdrawal of the


rejections as to claims 1-42. Applicants believe that the application is in condition for allowance and request the same. In accordance with the interview of January 12, 1006, to the extent that the Examiner is inclined to issue another Office Action rejecting some or all of the claims, Applicants request that the next Office Action be a non-final Office Action. To the extent there are any remaining issues, the Examiner may contact the undersigned by telephone.

Applicants believe that no fee is due with this submission. However, if it is determined that a fee is due, please charge the required fee to Morgan, Lewis & Bockius LLP Deposit Account No. 50-0310. A copy of this sheet is enclosed for this purpose.

Respectfully submitted,

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